

**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI**

In the Matter of Union Electric Company)	
d/b/a AmerenUE for Authority to File)	
Tariffs Increasing Rates for Electric)	Case No. ER-2008-0318
Service Provided to Customers in the)	
Company's Missouri Service Area.)	

UNIONS' POSITION STATEMENT

COME NOW International Brotherhood of Electrical Workers Locals 2, 309, 649, 702, 1439, 1455, AFL-CIO and International Union of Operating Engineers Local 148, AFL-CIO ("Unions"), by counsel, and respectfully states their position on the following issues:

1. The Unions support increasing funds to improve Ameren's employee infrastructure in general, including recruitment of new employees and training of its internal workforce. Ameren's reliance on subcontractors has reduced Ameren's ability to maintain its normal and sustained workload. Furthermore, investment in the infrastructure of its permanent workforce will increase worker and customer safety.

2. The Unions support requiring Ameren to fully and permanently staff itself within three years to support its normal and sustained workload. Ameren currently relies excessively on subcontractors, who are often less skilled and safe than Ameren employees. Often times, Ameren employees are required to correct mistakes made by subcontractors. Permanent staffing will reduce the need for costly subcontracting and for Ameren's permanent employees to work excessive overtime.

3. The Unions support that Ameren be responsible for the training and certification of its subcontractors, thereby insuring quality work. This will reduce the need for duplicative corrective work by Ameren employees to fix mistakes made by

subcontractors. Moreover, this will increase safety for customers, Ameren employees, and subcontractors.

4. Finally, the Unions support that Ameren be required to make good faith efforts to hire both its internal and external workforces locally, especially its customer service employees. This will both improve the quality of its work and decrease customer complaints, while further the State interest of employing Missouri residents.

5. At this time, the Unions take no position on any other issues raised in this matter.

Respectfully submitted,

/s/ Michael A. Evans
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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on November 13, 2008, by United States mail, hand-deliver, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

/s/ Michael A. Evans